

**VA**



U.S. Department  
of Veterans Affairs

# Shallow Subsidy Office Hour March 12, 2021

[Link to Audio and Video](#)



# AGENDA

- Welcome and Introductions
- Re-Introduction of Shallow Subsidy
- HMIS Reporting Requirements
- Equity Considerations
- Shallow Subsidy Updates-Modifications allowed by Stafford Act
- P3 Financial Updates
- Questions



# (Re)Introduction of Shallow Subsidy



## SHALLOW SUBSIDY AT A GLANCE

- Veterans enrolled in SSVF- Rapid Re-housing or Homeless Prevention
  - Generally expected to be part of a progressive engagement approach, employed after Rapid Re-housing or Homeless Prevention assistance.
- Max rate is 35% of FMR or rent reasonableness
- Subsidies are not portable and cannot be used outside of approved Shallow Subsidy communities as identified in the Federal Register.
- Subsidy amount is fixed over the 24 month commitment.
- Veterans have the ability to be re-enrolled at the end of the 24 month assistance period.



## SHALLOW SUBSIDY COMMUNITIES AS OF FY21

The Shallow Subsidy coverage areas for the FY2021 grant year are limited to the following geographical areas as identified by county.

- **California:** Los Angeles, San Francisco, Alameda, San Diego, Santa Clara, Contra Costa, Marin, San Mateo, San Bernardino, Kern, Riverside, Orange, Imperial, Solano, Santa Cruz, Ventura, Sacramento, Amador, San Joaquin, Kings, Tulare
- **Washington:** King, Pierce, Snohomish
- **Hawaii:** Honolulu, Hawaii, Maui, Kauai
- **Illinois:** Cook
- **New York:** New York, Bronx, Queens, Kings, Richmond, Nassau, Westchester, Rockland, Putnam, Ulster, Sullivan, Suffolk
- **District of Columbia:** District of Columbia
- **Virginia:** Fairfax, Prince William
- **Maryland:** Prince Georges, Montgomery



## SHALLOW SUBSIDY CANDIDATES

- Veteran who is eligible for SSVF.
  - Requires minimal supportive services/tenancy supports and only needs moderate rental assistance differentiating it from HUD-VASH.
  - Could potentially be a good candidate for HVRP or other employment service (not required) and/or has the ability to build income (work or non-work) over time.
  - Has the ability to pay the balance of rent.
    - If the rent on a studio unit is \$1,273. Shallow Subsidy will cover \$445.55. Veteran has the demonstrated ability to pay \$827.45



## CONSIDERATIONS FOR UTILIZATION

- Co-enroll with HVRP or other employment program
- Can be part of a shared housing strategy
- Could potentially be recertified after Shallow Subsidy period ends
- Explore and apply for affordable housing, if applicable, while in Shallow Subsidy
- Partner with other local resources to pursue leveraging (non-federal) funds to deepen the subsidy



# HMIS REPORTING REQUIREMENTS



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- SSVF providers are not required to conduct re-certifications of eligibility while the Veteran household is receiving Shallow Subsidy payments. However, providers are required to do monthly check-ins with participants to assess for housing stability, and progress toward increasing income or other agreed upon goals that would allow the Veteran to sustain permanent housing after SSVF assistance ends.
- SSVF providers must document monthly check-ins with Veterans in HMIS by entering a service using data element V2 Service Type -*Shallow Subsidy*
- SSVF providers must document all TFA rental payments in HMIS by entering the date and amount of financial assistance and selecting HMIS data element V3 Financial Assistance Type -*Extended Shallow Subsidy –Rental Assistance*.
- Grantees should also document Veteran income in HMIS on a quarterly basis.
- Data Reporting Requirements for Shallow Subsidy are available in the FY2021 VA Data Guide on the SSVF Website



# HMIS REPORTING REQUIREMENTS

- Document Shallow Subsidy activities in HMIS under the SSVF renewal award
- Veteran households who are initially enrolled in traditional SSVF and later begin receiving Shallow Subsidy services will remain open in HMIS
- Veteran households should not be exited from SSVF and reopened with a new enrollment when they begin receiving Shallow Subsidy services unless they are being referred from another SSVF grantee.
- When accepting transfer from another SSVF provider document using original HMIS project type (RRH or HP) and current housing status



# EQUITY CONSIDERATIONS



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- What are the demographics of your agency clientele?
- Do your Shallow Subsidy participants match the demographics of your agency clientele?
  - If not, why?
  - Is there action or further review needed?
- Are you seeing disparities or service gaps?
  - With referrals?
  - With services offered? Or services received?
  - With negative exits?
  - Who are you partnering with to review/address any disparities noted?
    - Veterans with lived expertise? Meaningful partnerships with community advocacy groups?

**Always ask....What could be the driver for any difference noted?**



# Modifications Allowed By Stafford Act



## STAFFORD ACT

**The Stafford Act** is the federal disaster declaration that allows for increased flexibilities in the SSVF Programs. Although the end date of the Stafford Act is not known yet, the SSVF Program Office has been granted the authority to continue providing expanded services **90 days beyond the end date** when declared. This authority allows Grantees to continue to provide additional financial assistance, along with emergency housing assistance in hotels, with the goal to successfully transition and stabilize Veterans in permanent housing.



## STAFFORD ACT EXEMPTIONS

- For households at 30-50% AMI, current regulations meant Shallow Subsidy had limited value
  - Length of subsidy for this group was normally 2 years minus months of “traditional” SSVF rental assistance
- **New Stafford Act exemption** allows grantee to set time limit without regard to previous rental assistance
  - This would allow for Veteran households between 30% and 50% AMI to receive a full 2 years of supports regardless of prior assistance provided, if they were enrolled after March 2020



## MODIFIED FEATURES

- Recommend that grantee sets time limit at 2 years for all placements supported by Shallow Subsidies, regardless of previous rental support
- Commitments made during Stafford Act exemption continues beyond end of disaster declaration – Shallow Subsidy rent support is a full 2 years
- Max rate is 35% of rent reasonableness (which can be, but is not limited to, FMR)



# P3 GRANTEE FINANCIAL UPDATES



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- Currently all Shallow Subsidy P3 grants are operating using funds set up in FY20 and the grant term has been extended to 09/30/2022 (3 years).
- Additional funds were awarded in FY21 (25% of original award) and will be activated once original account has been exhausted
- Funding caveat: CARES funds have been provided to all Shallow Subsidy grantees (29% of original award amount) and these accounts will be activated in the next week. All P3 spending should be covered by these accounts first.
  - Existing accounts will be frozen until CARES 3.0 funds are exhausted. Once fully utilized, existing accounts will be reactivated.



# QUESTIONS / DISCUSSION